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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107

SUBJECT: Franklin Smelting Lead Monitoring Data      DATE: 3-27-95  
          1988 - 1994

FROM: Catherine Brown  
          Environmental Scientist

TO: Jim Hagedorn  
      Inspector

As a followup to our conversation last week, I have attached to this memo a table of the ambient monitoring data for lead in the vicinity of Franklin Smelting in Philadelphia from 1988 through 1994. The data are valid quarterly averages from the four monitors in the area and a background average from three sites elsewhere in Philadelphia for which the AIRS database had complete data for those years.

I spoke with Dr. Forman about her work on the Imminent and Substantial Threat determination. Her analysis was done in 1992 and utilized only the 3 quarters of available lead data from the maximum site. The quarterly lead average used in the analysis was 6.23 ug/m<sup>3</sup>. More recent quarterly averages were 2-3 times as high (see attached table) and daily values have reached as much as 24 times as high. The fourth quarter average for 1994 was 22.06 ug/m<sup>3</sup>, the highest at the PGW location to date. Also, the model used was the most currently available (UBK 6.0) at the time. More recent versions of the model are available. Additionally, NEIC conducted soil sampling in the vicinity of the facility since the time of her analysis. All of this information suggests that the Imminent and Substantial Threat analysis could be revisited for support of EPA taking action against the facility.

We feel very strongly that the inability of the facility to attain the ambient standard for lead has reached a critical stage and are pursuing the evidence to support EPA taking action. Ted Erdman from my section has made contact with the city expressing our wish to obtain 1995 first quarter data as soon as possible, after the end of the quarter. He received preliminary information that the network around Franklin has had lead values of 14 and 40 ug/m<sup>3</sup> so far this quarter which will mean another exceedance. We will make this data available to you as soon as we have it.

Please let me know if you require more information.

AR100001

**Ambient Lead (Pb) Monitoring Data  
Franklin Smelting Vicinity  
1988 - 1995**

Year/Q	PGW	ITO	WAC	NET	Backgrd
1988/1		2.57	0.23	0.29	0.12
2		1.23	0.28	0.34	0.09
3		0.71	0.25	0.37	0.08
4		2.36	0.41	0.33	0.08
1989/1	9.99	1.58	0.30	0.18	0.08
2	4.85	0.80	0.25	0.20	0.08
3	6.56	0.60	0.22	0.16	0.08
4	4.77	1.60	0.49	0.16	0.08
1990/1	3.65	0.96	0.28	0.42	0.12
2		2.43	0.60	0.28	0.08
3		1.51	0.60	0.27	0.07
4		2.95	0.19	0.30	0.11
1991/1		1.36	0.32	0.13	0.09
2		1.09	0.51	0.16	0.09
3		0.97	0.26	0.21	0.09
4	3.82	1.34	0.40	0.35	0.13
1992/1	6.01	3.20	0.25	0.39	0.08
2	17.63	0.87	0.15	0.57	0.10
3	10.04	0.88	0.33	0.46	0.09
4	4.81	3.67	0.44	0.30	0.07
1993/1	8.97	6.08	0.24	0.25	0.08
2	11.23	0.94	0.22	0.47	0.13
3	7.94	1.54	0.93	0.34	0.07
4	15.40	1.29	0.79	0.32	0.13
1994/1	7.92	2.61	0.26	0.13	0.07
2	3.85	1.77	0.59	0.28	0.10
3	8.24	1.78	0.54	0.49	0.14
4	22.06	2.01	0.41	0.49	0.19
1995/1					

Note: Background values average of 3 sites (Lab, STJ, CHS)  
All data through 1994 taken from AIRS/AQS database March 1995.  
Data for 1Q 1995 from Philadelphia AMS.

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**Ambient Lead (Pb) Monitoring Data  
Franklin Smelting Vicinity  
1988 - 1995**

Year/Q	PGW	ITO	WAC	NET	Backgrd
1988/1		2.57	0.23	0.29	0.12
2		1.23	0.28	0.34	0.09
3		0.71	0.25	0.37	0.08
4		2.36	0.41	0.33	0.08
1989/1	9.99	1.58	0.30	0.18	0.08
2	4.85	0.80	0.25	0.20	0.08
3	6.56	0.60	0.22	0.16	0.08
4	4.77	1.60	0.49	0.16	0.08
1990/1	3.65	0.96	0.28	0.42	0.12
2		2.43	0.60	0.28	0.08
3		1.51	0.60	0.27	0.07
4		2.95	0.19	0.30	0.11
1991/1		1.36	0.32	0.13	0.09
2		1.09	0.51	0.16	0.09
3		0.97	0.26	0.21	0.09
4	3.82	1.34	0.40	0.35	0.13
1992/1	6.01	3.20	0.25	0.39	0.08
2	17.63	0.87	0.15	0.57	0.10
3	10.04	0.88	0.33	0.46	0.09
4	4.81	3.67	0.44	0.30	0.07
1993/1	8.97	6.08	0.24	0.25	0.08
2	11.23	0.94	0.22	0.47	0.13
3	7.94	1.54	0.93	0.34	0.07
4	15.40	1.29	0.79	0.32	0.13
1994/1	7.92	2.61	0.26	0.13	0.07
2	3.85	1.77	0.59	0.28	0.10
3	8.24	1.78	0.54	0.49	0.14
4	22.06	2.01	0.41	0.49	0.19
1995/1					

**Note: Background values average of 3 sites (Lab, STJ, CHS)**

All data through 1994 taken from AIRS/AQS database (March 1995).  
Data for 1Q 1995 from Philadelphia AMS.

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